

CEI REPORT REVIEW CHECKLIST  
COMPLIANCE SECTION (T-2-6)

04-21-95

Contractor \_\_\_\_\_ OR State Office CA. Reg. 3  
Facility Vandenberg AFB  
Date of Inspection 4/19-4/21 Date Report Received MAY/31/95  
Reviewer Patricia Bodine Date of this Review 7/18/95

This review pertains only to the quality of the written report. This review cannot assess the quality of the on-site inspection.

TIMELINESS ( S = Satisfactory OR U = Unsatisfactory ) Rating  
30 days (Contractor and Guam postmarked) \_\_\_\_\_  
45 days (State) S

CONTENTS (S or U)

\*Narrative includes list of all regulated units and accumulation areas. S  
\*Narrative includes assessment of status of past Class I violations still outstanding. S  
\*Report includes list of potential violations. S  
\*Report includes assessment of facility's compliance with financial responsibility requirements. N/A  
\*Photographs with complete descriptions are included. S  
\*List of Attachments is present and complete. S

QUALITY ( S, U, or NI = Needs Improvement )

Narrative cross-references photos and attachments when applicable. S  
List of potential violations is specific and comprehensive. S  
\*Existing documentation for potential violations is included. S  
Checklist is complete and includes comments to support "No" responses. S  
Narrative contains description/status of each regulated unit. S  
Extra score for the following reason: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

OVERALL: S

\*If this item is marked "U" then Overall is a "U".

RCRA OVERSIGHT INSPECTION REPORT  
ENVIRONMENTAL PROTECTION AGENCY, REGION 9  
HAZARDOUS WASTE MANAGEMENT DIVISION  
WASTE COMPLIANCE BRANCH

Purpose: RCRA Oversight Investigation

Facility: Vanderberg AFB  
305TH TFW  
206 18TH Street Suite 3  
Vanderberg AFB, CA 93437

Facility ID Number: CA 9570025149

Date of Inspection: April 19-21, 1995

Lead Inspector: Larry Stuck

Lead Inspector's Employer: PTSC, CA. Reg. 3

EPA Investigator: Nina Bodine  
Reg. 9

Other Inspectors: Carlos Ortega, PTSC, Reg. 3

Facility Representatives: Louis Vanmullen Colonel  
Alamo, Arif, Environmental Manager

Report Date: July 19, 1995

## RCRA INSPECTION OVERSIGHT FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remarks</u>
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## I. Pre-Inspection Evaluation

- A. Did the inspector have a current set of Federal RCRA regulations with him/her? ☒ ☐ ☐ ☐
- B. Did the inspector review the Part A application or effective permit before beginning the inspection? ☒ ☐ ☐ ☐
- C. Did the inspector have the appropriate personal safety equipment (boots, hard hats, safety glasses, boot covers, gloves, respirator, protective suits)? ☒ ☐ ☐ ☐
- D. Did the inspector have an operable camera? ☒ ☐ ☐ ☐
- E. Did the inspector brief the EPA oversight inspector prior to the inspection? ☒ ☐ ☐ ☐

## II. Facility Representative Interview

- A. Did the inspector present an identification showing the authority to perform RCRA inspections?
- B. Did the inspector advise the facility representative of the purpose of the inspection and briefly describe the agenda?
- C. Did the inspector determine how many accumulation areas the facility maintains? If so, how many?

# RCRA INSPECTION OVERSIGHT FORM

	Yes	No	N/A	Remarks
III. Document Inspection				
A. Did the inspector review all relevant documents during the inspection or arrange to obtain copies for later review?	✓			
1. Part A application or permit?	✓			
2. Facility inspection schedule	✓			
3. Personnel training record	✓			
4. Operating record				
a. waste receiving log	✓			
b. location of hazardous waste	✓			
c. waste analysis results	✓			
d. contingency plan implementation reports	✓			
e. inspection log	✓			
f. monitoring data	✓			
g. closure cost estimates			✓	Ind. Fac.
5. Contingency plan	✓			
6. Waste analysis plan	✓			
7. Closure and post-closure plan	✓			
8. Financial instruments			✓	Ind. Fac.

## RCRA INSPECTION OVERSIGHT FORM

	Yes	No	N/A	Remarks
9. Liability document	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>Fed. Tac.</i>
10. Manifests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Ground-water monitoring reports	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
12. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>IV. Facility Inspection</b>				
A. Did the inspector correctly record observations made during the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Did the inspector identify any activities that are regulated but not on the Part A or Permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C. How many accumulation areas were inspected? Was this an adequate amount considering time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>11</i>
D. Did inspector observe generation areas corresponding to the above accumulation areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
E. Did the inspector examine alarms, fire extinguishers, and other safety equipment to ensure that they are functional?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>V. Knowledge of the Regulations</b>				
A. Was the inspector knowledgeable of RCRA regulations applicable to the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Was the inspector aware of recent amendments to the applicable regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INSPECTION OVERSIGHT FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remarks</u>
C. Was the inspector able to answer questions accurately?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
D. Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
VI. Completion of Inspection Forms (Also complete 1-page CEI Report Review Checklist and attach.)				
A. Did the inspector fully complete the applicable portions of the inspection forms?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Does the inspector's report accurately reflect your observations at the facility? Did the inspector find all apparent violations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C. Did the inspector miss any Class I violations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D. Did the inspector clearly document the physical violations using photography when possible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
E. Are the photographs described completely and accurately?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
F. Are photographs cross-referenced in narrative when applicable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## VII. Remarks

A. What is your overall assessment of the:

## RCRA INSPECTION OVERSIGHT FORM

### INSPECTION ?

The Vandenberg Air Force Base inspection was conducted over a three day period. The first and second day of the inspection was primarily the physical inspection of the facility with record review on the afternoon of the second day. The third day was comprised of record review and sampling at the oil water separator. U. S. EPA inspector was only present for the purpose of oversight on the second day of the inspection.

### INSPECTION REPORT ?

The inspection report was well organized and complete. The report had two areas that I felt could have been better defined and they are on pages 7 and 10. Page 7 states; " The south bay contained a few hundred drums of flammables, acids, PCB's and other waste". Page 10 states; "There were several hundred containers in the ISD storage building and Ortega and I inspected nearly each container and label".

I would suggest in the future (in the event of enforcement) that the number of drums be called out in the report. The words "several" and "many" hundreds of drums are not very specific. If this statement was used in a formal enforcement case it may be at risk of having the penalty greatly reduced or thrown out by the trial judge as ambiguous.

### INSPECTOR ?

I found Larry Stuck to be very knowledgeable of the RCRA regulations as well as other environmental regulations.

### B. ADDITIONAL REMARKS FROM OTHER SECTIONS:

It was unclear to the U.S. EPA inspector after reviewing the report why the samples taken on April 21, were not delivered to the state laboratory until April 25. Where were the samples stored during that period of time?